

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

CENTER CITY HEALTHCARE, LLC d/b/a
HAHNEMANN UNIVERSITY HOSPITAL, *et al.*,¹

Debtors.

Chapter 11

Case No. 19-11466 (MFW)

(Jointly Administered)

CENTER CITY HEALTHCARE, LLC, d/b/a
HAHNEMANN UNIVERSITY HOSPITAL,
PHILADELPHIA ACADEMIC HEALTH
SYSTEM, LLC, ST. CHRISTOPHER'S
HEALTHCARE, LLC, PHILADELPHIA
ACADEMIC MEDICAL ASSOCIATES, LLC,
HPS OF PA, LLC, SCHC PEDIATRIC
ASSOCIATES, LLC, ST. CHRISTOPHER'S
PEDIATRIC URGENT CARE CENTER, LLC,
SCHC PEDIATRIC ANESTHESIA
ASSOCIATES, LLC, STCHRIS CARE AT
NORTHEAST PEDIATRICS, LLC, TPS OF
PA, LLC, TPS II OF PA, LLC, TPS III OF PA,
LLC, TPS IV OF PA, LLC, AND TPS V OF
PA, LLC,

Plaintiffs,

v.

HRE CAPITAL, LLC f/k/a HEALTHCARE
REAL ESTATE CAPITAL, LLC,

Defendant.

Adv. Proc. No. 21-50912 (MFW)

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Center City Healthcare, LLC (3341), Philadelphia Academic Health System, LLC (8681), St. Christopher's Healthcare, LLC (8395), Philadelphia Academic Medical Associates, LLC (8165), HPS of PA, L.L.C. (1617), SCHC Pediatric Associates, L.L.C. (0527), St. Christopher's Pediatric Urgent Care Center, L.L.C. (6447), SCHC Pediatric Anesthesia Associates, L.L.C. (2326), StChris Care at Northeast Pediatrics, L.L.C. (4056), TPS of PA, L.L.C. (4862), TPS II of PA, L.L.C. (5534), TPS III of PA, L.L.C. (5536), TPS IV of PA, L.L.C. (5537), and TPS V of PA, L.L.C. (5540). The Debtors' mailing address is 216 North Broad Street, 4th Floor, Philadelphia, Pennsylvania 19102.

PLAINTIFF'S SECOND STATUS REPORT

Center City Healthcare, LLC, Philadelphia Academic Health System, LLC, St. Christopher's Healthcare, LLC, Philadelphia Academic Medical Associates, LLC, HPS of PA, L.L.C., SCHC Pediatric Associates, L.L.C., St. Christopher's Pediatric Urgent Care Center, L.L.C., SCHC Pediatric Anesthesia Associates, L.L.C., StChris Care at Northeast Pediatrics, L.L.C., TPS of PA, L.L.C., TPS II of PA, L.L.C., TPS III of PA, L.L.C., TPS IV of PA, L.L.C., and TPS V of PA, L.L.C. (collectively, the "**Debtors**" or the "**Plaintiffs**"), the debtors and debtors-in-possession in the above captioned jointly administered chapter 11 cases and the Plaintiffs in the captioned adversary proceeding (the "**Adversary Proceeding**"), by and through their undersigned attorneys, hereby provide the following status report with respect to the Adversary Proceeding filed against HRE Capital, LLC f/k/a Healthcare Real Estate Capital, LLC (the "**Defendant**").

1. On June 30, 2019 and July 1, 2019, each of the Debtors commenced a case under chapter 11 of the Bankruptcy Code. The Debtors continue to operate their business and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No party has requested the appointment of a trustee or examiner in these Chapter 11 Cases.

2. On June 24, 2021, Plaintiffs filed the complaint in the Adversary Proceeding against the Defendant.

3. Pursuant to an order assigning adversary proceeding to mediation and setting mediation deadlines dated July 8, 2022 [Adv. D.I. 27], Leslie A. Berkoff conducted a mediation on December 19, 2022. The mediation concluded without any settlement.

4. The parties intend to discuss a scheduling order for this Adversary Proceeding to be submitted to the Court for approval.

5. Discovery in the Adversary Proceeding has not yet concluded.

Date: January 23, 2023

SAUL EWING LLP

By: /s/ John D. Demmy
Mark Minuti (DE Bar No. 2659)
John D. Demmy (DE Bar No. 2802)
Monique B. DiSabatino (DE Bar No. 6027)
1201 N. Market Street, Suite 2300
P.O. Box 1266
Wilmington, DE 19899
Telephone: (302) 421-6800
Fax: (302) 421-6813
mark.minuti@saul.com
john.demmy@saul.com
monique.disabatino@saul.com

-and-

Jeffrey C. Hampton
Adam H. Isenberg
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102
Telephone: (215) 972-7777
Fax: (215) 972-7725
jeffrey.hampton@saul.com
adam.isenberg@saul.com

Counsel for Plaintiffs